



JUL 23 2015

Mr. Darryl Shaffer
Ardagh Glass Inc.
P.O. Box 4200
Muncie, IN 47307-4200

**Re: Notice of Minor Title V Permit Modification
District Facility # C-801
Project # C-1151975**

Dear Mr. Shaffer:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit to Operate (PTO) C-801-43-5 of the facility's current Title V operating permit. The facility is proposing to correct the differential pressure of dust collector from the current limit of 5 to 17 inches of water column to the correct limit of 0.5 to 5 inches of water column as provided in the manufacturer specifications.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO C-801-43-7, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1151975

Engineer: Gurpreet Brar
Date: July 2, 2015

Facility Number: C-801
Facility Name: Ardagh Glass Inc.
Mailing Address: P.O. Box 4200
Muncie, IN 47307-4200

Contact Name: Darryl Shaffer
Phone: (765) 741-7117

Responsible Official: Darryl Shaffer
Title: Plant Manager

I. PROPOSAL

Ardagh Glass Inc. is proposing a Minor Modification to their Title V Permit. The Minor Modification consists of correcting the minimum differential pressure of dust collector from 5 inches to 0.5 inches of water column and maximum differential pressure from 17 inches to 5 inches of water column as provided in the manufacturer specifications. The permit conditions will also be revised to clarify the permit by replacing the term "baghouse" with "dust collector" throughout the permit.

Ardagh Glass Inc. was issued their Title V permit on July 15, 1998. No new Authority to Construct permits are associated with this Minor Modification.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

Ardagh Glass Inc. is located at 4441 Avenue 12 & Road 24 ½ in Madera, CA.

III. EQUIPMENT DESCRIPTION

C-801-43-7: NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY MAC PROCESS MODEL 120LST81 DUST COLLECTOR

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

A recent inspection of the facility has indicated that the differential pressure operating range of the dust collector was incorrect and the permit will be revised to correct the differential pressure limit under this minor modification project. Ardagh Glass Inc is proposing to correct the differential pressure of dust collector from the current limit of 5 to 17 inches of water column to the correct limit of 0.5 to 5 inches of water column as provided in the manufacturer specifications. Condition #6 has been revised to reflect the correct the differential pressure limits of the dust collector. The conditions throughout the permit will also be revised for clarification purposes by replacing the term "baghouse" with "dust collector".

C-801-43-7: North Side Conveyor And Cullet Weighing Conveyor

1. Visible emissions from dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
5. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]

6. The dust collector shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201]
8. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
9. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
10. Replacement filters numbering at least 10% of the total number of filters in the dust collector shall be maintained on the premises. [District Rule 2201]
12. Visible emissions from the dust collector shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted [District Rule 2520]
13. Dust collector filters for the dust collector shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520]
14. Dust collector filters for the dust collector shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520]
15. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201]
16. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520]
17. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Application
- D. Compliance Certification Form

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-801-43-7

EXPIRATION DATE: 01/31/2015

EQUIPMENT DESCRIPTION:

NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY MAC PROCESS MODEL 120LST81 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr), as determined using the following formula: $E = 3.59 \times P^{0.62}$, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Controlled PM10 emissions from the dust collector shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The dust collector shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
8. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement filters numbering at least 10% of the total number of filters in the dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Visible emissions from the dust collector shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted [District Rule 2520] Federally Enforceable Through Title V Permit
13. Dust collector filters for the dust collector shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Dust collector filters for the dust collector shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4201 (as amended December 17, 1992) and 4202 (as amended December 17, 1992) and Madera County Rule 402. A permit shield is granted from these requirements [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-801-43-5

EXPIRATION DATE: 01/31/2015

EQUIPMENT DESCRIPTION:

NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY MAC PROCESS MODEL 120LST81 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr), as determined using the following formula: $E = 3.59 \times P^{0.62}$, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Controlled PM10 emissions from the dust collector shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 5 inches water column and a maximum differential pressure of 17 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
8. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Visible emissions from each baghouse shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted [District Rule 2520] Federally Enforceable Through Title V Permit
13. Dust collector filters for each baghouse shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

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16. Records of dust collector maintenance, inspections, and repair for each baghouse shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4201 (as amended December 17, 1992) and 4202 (as amended December 17, 1992) and Madera County Rule 402. A permit shield is granted from these requirements [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org


RECEIVED

JUN 18 2015

Permit Application For:

Permits Services
SJVAPCD

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Ardagh Glass Inc.	
2. MAILING ADDRESS: STREET/P.O. BOX: P.O. Box 4200 CITY: Muncie STATE: Indiana 9-DIGIT ZIP CODE: 47302-4200	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 24441 Avenue 12 & Road 24 1/2 CITY: Madera 1/4 SECTION TOWNSHIP RANGE	INSTALLATION DATE: March 2006
4. GENERAL NATURE OF BUSINESS: Container glass production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) C-801-43: Change in listed differential operating pressure for baghouse	
6. TYPE OR PRINT NAME OF APPLICANT: Darryl Shaffer	TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: 	DATE: 6/9/15 PHONE: (765) 741-7117 FAX: (765) 741-4846 EMAIL: darryl.d.shaffer@ardaghgroup.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$19.00 (\$38.00) CHECK#: 02702091
	DATE PAID: June 18, 2015
	PROJECT NO: C-1151975 FACILITY ID: C-801

ATTACHMENT D

Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

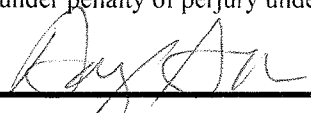
☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: Ardagh Glass Inc.	FACILITY ID: C- 801
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Ardagh Glass Inc.	
3. Agent to the Owner: n/a	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

6/19/15
Date

Darryl Shaffer

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)